

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA *ex rel.* JOHN
DOE and THE STATE OF NEW YORK *ex rel.*
JOHN DOE,

Plaintiffs,

v.

STRUCTURED EMPLOYMENT ECONOMIC
DEVELOPMENT CORPORATION,

Defendant.

No. 11 Civ. 6425 (AKH)

UNITED STATES OF AMERICA

Plaintiff-Intervenor

v.

STRUCTURED EMPLOYMENT ECONOMIC
DEVELOPMENT CORPORATION, ALEX MR.
SAAVEDRA, SHOMARI GREENE, ALAN KATZ,
TAGEWATEE CHANDARPAUL, SHANDELL
SANTIAGO-VELEZ, MITCHELL MCCLINTON,
and MONIQUE TARRY,

Defendants.

**DEFENDANT ALEX SAAVEDRA'S NOTICE OF MOTION TO DISMISS THE
COMPLAINT IN INTERVENTION OF THE UNITED STATES OF AMERICA**

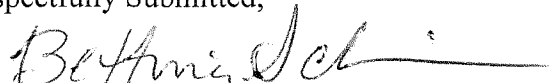
PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and upon the relevant submissions of the co-defendants in this matter, the defendant Alex Saavedra will move this Court before the Honorable Alvin K. Hellerstein at the United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the district court for an Order:

- (1) Pursuant to Fed.R.Civ.P. 12 (b)(6) granting Mr. Saavedra's Motion to Dismiss the Complaint with prejudice, for failure to state a claim upon which relief can be granted;
- (2) Pursuant to Fed R.Civ. P. 9 (b) for failure to plead the claims for relief with sufficient particularity; and
- (3) for such other relief as to this Court seems just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Rules of the Court opposing papers should be submitted within fourteen days after service of this motion or any agreed upon adjourn date acceptable to the Court.

Dated: New York, New York
January 14, 2013

Respectfully Submitted,


BETTINA SCHEIN
565 Fifth Avenue 7th Floor
New York, New York 10007
Counsel for Defendant Alex Saavedra

To: AUSA Sarah J. North
United States Attorney's Office
Southern District of New York
86 Chambers Street
New York, New York 10007

Clerk of the Court